UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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ARIEL SATURNE,   Case No.: 2:21-cv-03311
                                                     (FB-ST)
                              Plaintiff,
                                                     RULE 26
          -v-   **DISCLOSURE**

CERTIFIED LUXURY MOTORS d/b/a CERTIFIED
LUXURY MOTORS OF VALLEY STREAM and d/b/a
CERTIFIED LUXURY MOTORS OF GREAT NECK,
JOVIA FINANCIAL CREDIT UNION and
JOHN DOES 1-10,

                              Defendants.
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Defendant, JOVIA FINANCIAL CREDIT UNION, by and through its attorneys,

LITCHFIELD CAVO, LLP, as and for its Initial Response Pursuant to Rule 26 of the Federal

Rules of Civil Procedure, states as follows:

1.   Names, addresses and telephone numbers of persons who might have some

discoverable information:

          Vittorio Scafidi, AVP of Lending;
          Laura Norton, Consumer Loan Manager

2.   Description by category and location of documents, electronically stored

information, and tangible things that the disclosing party has in its possession, custody or control:

Documents and electronically stored information are in the possession of those witnesses

listed above that are employed by Jovia Financial Credit Union.

3.   A computation of each category of damages claimed by the disclosing party:

          Not applicable.

4.   A copy of the insurance policy will be provided under separate cover.

Dated: New York, New York
       September 28, 2021

LITCHFIELD CAVO, LLP

/s/

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By: Brian S. Gitnik, Esq. (BSG3766)
420 Lexington Avenue, Suite 2104
New York, New York 10170
Tel: (212) 434-0100
Fax: (212) 434-0105
Attorneys for Defendant
JOVIA FINANCIAL CREDIT UNION

To: Brian L. Bromberg, Esq.
       Joshua Tarrant-Windt
       Bromberg Law Office, P.C.
       352 Rutland Road #1
       Brooklyn, New York 11225
       (212) 248-7906
       Attorneys for Plaintiff
       ARIEL SATURNE

       Bruce W. Minsky, Esq.
       Law Office of Bruce W. Minsky, P.C.
       112 Brick Church Road
       New Hempstead, New York 10977
       (646) 234-7006
       Attorneys for Defendants
       CERTIFIED LUXURY MOTORS d/b/a
       CERTIFIED LUXURY MOTORS OF VALLEY STREAM d/b/a
       CERTIFIED LUXURY MOTORS OF GREATNECK